

052-15-2005

7/9/84

copy to -
Ann McGinley
8-D-7POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT

REGION 6	SITE NUMBER (to be assigned by HQ) TX02496
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GENERAL INSTRUCTIONS: Complete Sections I and III through XV of this form as completely as possible. Then use the information on this form to develop a Tentative Disposition (Section II). File this form in its entirety in the regional Hazardous Waste Log File. Be sure to include all appropriate Supplemental Reports in the file. Submit a copy of the forms to: U.S. Environmental Protection Agency, Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335), 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME Chemical Recycling, Inc. (aka JR Siemoneit)		B. STREET (or other identifier) 802 Kirby St.	
C. CITY Wylie	D. STATE TX	E. ZIP CODE 75098	F. COUNTY NAME Collin
G. SITE OPERATOR INFORMATION 1. NAME James Robert Siemoneit, President, Wylie, TX 75098		2. TELEPHONE NUMBER 214/442-5495	
3. STREET 802 Kirby St.	4. CITY Wylie	5. STATE TX	6. ZIP CODE 75098
H. REALTY OWNER INFORMATION (if different from operator of site) 1. NAME Same		2. TELEPHONE NUMBER Same	
3. CITY		4. STATE	5. ZIP CODE
I. SITE DESCRIPTION (chlorinated hydrocarbons, paint wastes, printing ink wastes) Reclamation of solvents by distillation			
J. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE			

II. TENTATIVE DISPOSITION (complete this section last)

A. ESTIMATE DATE OF TENTATIVE DISPOSITION (mo., day, & yr.)	B. APPARENT SERIOUSNESS OF PROBLEM <input type="checkbox"/> 1. HIGH <input checked="" type="checkbox"/> 2. MEDIUM <input type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE
C. PREPARER INFORMATION 1. NAME Robert H. Davis, Jr. 2. TELEPHONE NUMBER 512/477-9901 3. DATE (mo., day, & yr.) March 26, 1984	

III. INSPECTION INFORMATION

A. PRINCIPAL INSPECTOR INFORMATION 1. NAME Robert H. Davis, Jr. 2. TITLE Staff Engineer		4. TELEPHONE NO. (area code & no.) 512/477-9901
B. INSPECTION PARTICIPANTS		

1. NAME	2. ORGANIZATION	3. TELEPHONE NO.
Russell S. Dykes	Engineering-Science, Inc.	512/477-9901

C. SITE REPRESENTATIVES INTERVIEWED (corporate officials, workers, residents)		
1. NAME	2. TITLE & TELEPHONE NO.	3. ADDRESS
J. R. Siemoneit	President 214/442-5495	802 Kirby St., Wylie, TX 75098
Gerald G. Brock	Manager 214/442-5495	Same

9820899



Continued From Front

III. INSPECTION INFORMATION (continued)

D. GENERATOR INFORMATION (sources of waste)

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE GENERATED
Chem. Recycling	214/442-5495	802 Kirby St., Wylie, TX 75098	Process still bottoms, F001,003,005
Sherwin Williams	214/271-2541	2802 W. Miller Rd. Garland, TX 75040	Paint wastes
See Attachment A			

E. TRANSPORTER/HAULER INFORMATION

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE TRANSPORTED
Southern Bulk Solvents	214/869-0447	1645 Rhome, Dallas, TX (P. O. Box 35566)	Incoming spent solvents
Eltex Chemical Supply	713/795-5607	4050 Homestead Rd., Houston, TX	Still bottom wastes

F. IF WASTE IS PROCESSED ON SITE AND ALSO SHIPPED TO OTHER SITES, IDENTIFY OFF-SITE FACILITIES USED FOR DISPOSAL.

1. NAME	2. TELEPHONE NO.	3. ADDRESS
Chemical Waste Management	409/736-2821	Highway 73, Port Arthur, TX
Eltex Chemical Supply	713/795-5607	4050 Homestead Rd., Houston, TX
Texas Ecology	512/387-3518	P. O. Box 307 (3.5 miles south of Robstown Robstown, TX 78380 on Petronila Rd.)

G. DATE OF INSPECTION

(mo., day, & yr.)
2/16/84

H. TIME OF INSPECTION

9:00-1:20 p.m.

I. ACCESS GAINED BY (credentials must be shown in all cases)

☒ 1. PERMISSION☐ 2. WARRANT

J. WEATHER (describe)

Clear, approximately 45°F

IV. SAMPLING INFORMATION

A. Mark 'X' for the types of samples taken and indicate where they have been sent e.g., regional lab, other EPA lab, contractor, etc. and estimate when the results will be available.

1. SAMPLE TYPE	2. SAMPLE TAKEN (mark 'X')	3. SAMPLE SENT TO	4. DATE RESULTS AVAILABLE
a. GROUNDWATER			
b. SURFACE WATER	X	Engineering-Science 924 Gemini, Houston, TX 77058	6/4/84
c. WASTE			
d. AIR			
e. RUNOFF	X	Same	6/4/84
f. SPILL			
g. SOIL	X	Same	6/4/84
h. VEGETATION			
i. OTHER (specify)			

B. FIELD MEASUREMENTS TAKEN (e.g., radioactivity, explosivity, PH, etc.)

1. TYPE	2. LOCATION OF MEASUREMENTS	3. RESULTS
pH	Standing water in tank farm near drainpipe inlet	5.6
pH	Standing water in SE corner of drum storage area	6.9
pH	Standing water in catchment basin	11.5
pH	Runoff in ditch at SE corner of site	7.2

Continued From Front

VII. WASTE RELATED INFORMATION (continued)

2. Estimate the amount (specify unit of measure) of waste by category, mark 'X' to indicate which wastes are present.

a. SLUDGE		b. OIL		c. SOLVENTS		d. CHEMICALS		e. SOLIDS		f. OTHER	
AMOUNT	UNIT OF MEASURE	AMOUNT	UNIT OF MEASURE	AMOUNT	UNIT OF MEASURE	AMOUNT	UNIT OF MEASURE	AMOUNT	UNIT OF MEASURE	AMOUNT	UNIT OF MEASURE
Est. 1000	drums	None		Unknown		None		None		None	
X (1) PAINT, PIGMENTS		X (1) OILY WASTES		X (1) HALOGENATED SOLVENTS		X (1) ACIDS		X (1) FLYASH		X (1) LABORATORY PHARMACEUT	
(2) METALS SLUDGES		(2) OTHER(specify):		X (2) NON-HALOGENATED SOLVENTS		(2) PICKLING LIQUORS		(2) ASBESTOS		(2) HOSPITAL	
(3) POTW				(3) OTHER(specify): Incoming sol- vents (waste from other facilities) and refined product sol- vents awaiting resale		(3) CAUSTICS		(3) MILLING/MINE TAILINGS		(3) RADIOACTIVE	
(4) ALUMINUM SLUDGE						(4) PESTICIDES		(4) FERROUS SMELT- ING WASTES		(4) MUNICIPAL	
X (5) OTHER(specify): Still bottoms from solvent and waste reclaiming process						(5) DYES/INKS		(5) NON-FERROUS SMELTING WASTES		(5) OTHER(specify)	
						(6) CYANIDE		(6) OTHER(specify)			
						(7) PHENOLS					
						(8) HALOGENS					
						(9) PCB					
						(10) METALS					
						(11) OTHER(specify)					

D. LIST SUBSTANCES OF GREATEST CONCERN WHICH ARE ON THE SITE (place in descending order of hazard)

1. SUBSTANCE	2. FORM (mark 'X')			3. TOXICITY (mark 'X')				4. CAS NUMBER	5. AMOUNT	6. UNIT
	a. SOL- LID	b. LIQ.	c. VAPOR	a. HIGH	b. MED.	c. LOW	d. NONE			
The following compound names were noted on empty and partially-filled drums at site:										
Trichlorotrifluoroethane		X				X		76-13-1	Unknown	
Methyl ethyl ketone		X		(TLV) X				78-93-3	Unknown	
Dioxane		X		(TLV) X				123-91-1	Unknown	
Methylene chloride		X		(TLV) X				75-09-2	Unknown	
Isopropyl alcohol		X			X			66-63-0	Unknown	
1,1,1-trichloroethane		X			X			71-55-6	Unknown	
See Attachment A										

VIII. HAZARD DESCRIPTION

FIELD EVALUATION HAZARD DESCRIPTION: Place an 'X' in the box to indicate that the listed hazard exists. Describe the hazard in the space provided.

☐ A. HUMAN HEALTH HAZARDS

Continued From Page 2

IV. SAMPLING INFORMATION (continued)

C. PHOTOS

1. TYPE OF PHOTOS

☒ a. GROUND ☐ b. AERIAL

2. PHOTOS IN CUSTODY OF

Attached

D. SITE MAPPED?

☒ YES. SPECIFY LOCATION OF MAPS

Attached

E. COORDINATES

1. LATITUDE (deg.-min.-sec.)

33°00'20"

2. LONGITUDE (deg.-min.-sec.)

96°32'45"

V. SITE INFORMATION

A. SITE STATUS

☒ 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)☐ 2. INACTIVE (Those sites which no longer receive wastes.)☐ 3. OTHER (specify) _____
(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?

☒ 1. NO ☐ 2. YES (specify generator's four-digit SIC Code) _____

C. AREA OF SITE (in acres)

4.6 acres (fenced-in area is 3.0 acres)

D. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☒ 2. YES (specify) Office and warehouse under one roof

VI. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

X	A. TRANSPORTER	X	B. STORER	X	C. TREATER	X	D. DISPOSER
	1. RAIL		1. PILE		1. FILTRATION		1. LANDFILL
	2. SHIP		2. SURFACE IMPOUNDMENT		2. INCINERATION		2. LANDFARM
	3. BARGE	X	3. DRUMS		3. VOLUME REDUCTION		3. OPEN DUMP
X	4. TRUCK	X	4. TANK, ABOVE GROUND	X	4. RECYCLING/RECOVERY		4. SURFACE IMPOUNDMENT
	5. PIPELINE		5. TANK, BELOW GROUND		5. CHEM./PHYS./TREATMENT		5. MIDNIGHT DUMPING
	6. OTHER (specify):		6. OTHER (specify):		6. BIOLOGICAL TREATMENT		6. INCINERATION
					7. WASTE OIL REPROCESSING		7. UNDERGROUND INJECTION
				X	8. SOLVENT RECOVERY	X	8. OTHER (specify)
					9. OTHER (specify):		Off-site disposal and past spreading on surface soils

E. SUPPLEMENTAL REPORTS If the site falls within any of the categories listed below, Supplemental Reports must be completed. Indicate which Supplemental Reports you have filled out and attached to this for..

☒ 1. STORAGE ☐ 2. INCINERATION ☐ 3. LANDFILL ☐ 4. SURFACE IMPOUNDMENT ☐ 5. DEEP WELL

☐ 6. CHEM/BIO/PHYS TREATMENT ☐ 7. LANDFARM ☐ 8. OPEN DUMP ☐ 9. TRANSPORTER ☒ 10. RECYCLOR/RECLAIMER

Form not available

VII. WASTE RELATED INFORMATION

A. WASTE TYPE

☒ 1. LIQUID spills ☐ 2. SOLID ☒ 3. SLUDGE ☐ 4. GAS

B. WASTE CHARACTERISTICS

☐ 1. CORROSIVE ☒ 2. IGNITABLE ☐ 3. RADIOACTIVE ☐ 4. HIGHLY VOLATILE

☒ 5. TOXIC ☐ 6. REACTIVE ☐ 7. INERT ☒ 8. FLAMMABLE

☐ 9. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

shipping tickets since 1982 and monthly and annual waste summaries.

VIII. HAZARD DESCRIPTION (continued)

☐ B. NON-WORKER INJURY/EXPOSURE☒ C. WORKER INJURY/EXPOSURE

Environmental samples collected during the inspection indicate that spillage and contamination of surface soils and standing water has occurred at the site. In the process of handling solvents or wastes, workers may have been exposed directly or indirectly to these substances.

☐ D. CONTAMINATION OF WATER SUPPLY☐ E. CONTAMINATION OF FOOD CHAIN☐ F. CONTAMINATION OF GROUND WATER☒ G. CONTAMINATION OF SURFACE WATER

Runoff from undiked areas and any overflow of diked storage area drain eastward to a tributary of Muddy Creek.

VIII. HAZARD DESCRIPTION (continued)

☐ H. DAMAGE TO FLORA/FAUNA☐ I. FISH KILL☐ J. CONTAMINATION OF AIR☒ K. NOTICEABLE ODORS

Solvent and paint odors were noted in and near the process area.

☒ L. CONTAMINATION OF SOIL

Catchment basin, tank farm, and drum storage areas not lined. Paint spillage was observed in drum storage area. Metals (Zn, Pb, Cr) and numerous identified and unidentified organics were determined to be present in the surface soils and catchment basin sediment.

☐ M. PROPERTY DAMAGE

VIII. HAZARD DESCRIPTION (continued)

☒ N. FIRE OR EXPLOSION

None to date, but nature of solvents received and processed allows for serious incidents around process area, incoming drum storage, and loading/unloading area.

☒ O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID

Leaking containers were observed in designated drum storage area.

☒ P. SEWER, STORM DRAIN PROBLEMS

Discharge of process area runoff, spillage washdown, and periodic tank truck washdown occurs to sanitary sewer along with distillation condensate by way of underground pipeline from the catchment basin with a manual valve. Samples of sediment and waters from this basin showed elevated concentrations of metals (Pb, Zn, Cr) and various organic species. The water in this catchment basin had a pH of 11.5.

☐ Q. EROSION PROBLEMS☐ R. INADEQUATE SECURITY☐ S. INCOMPATIBLE WASTES

VIII. HAZARD DESCRIPTION (continued)

☐ T. MIDNIGHT DUMPING

☐ U. OTHER (specify)

IX. POPULATION DIRECTLY AFFECTED BY SITE

A. LOCATION OF POPULATION	B. APPROX. NO. OF PEOPLE AFFECTED	C. APPROX. NO. OF PEOPLE AFFECTED WITHIN UNIT AREA	D. APPROX. NO OF BUILDINGS AFFECTED	E. DISTANCE TO SITE (specify units)
1. IN RESIDENTIAL AREAS	3,200	3,200	1,150	1 mile
2. IN COMMERCIAL OR INDUSTRIAL AREAS	250	250	10	1 mile
3. IN PUBLICLY TRAVELLED AREAS	7,800	7,800	0	1 mile
4. PUBLIC USE AREAS (parks, schools, etc.)	1,700	1,700	3	1 mile

X. WATER AND HYDROLOGICAL DATA

A. DEPTH TO GROUNDWATER (specify unit) average estimate 20 feet	B. DIRECTION OF FLOW east-southeasterly	C. GROUNDWATER USE IN VICINITY none
D. POTENTIAL YIELD OF AQUIFER 125 gallons/minute*	E. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure) 2.3 miles	F. DIRECTION TO DRINKING WATER SUPPLY NE

G. TYPE OF DRINKING WATER SUPPLY

☐ 1. NON-COMMUNITY < 15 CONNECTIONS*

☒ 2. COMMUNITY (specify town) > 15 CONNECTIONS

Wylie, from Lake Laron

☒ 3. SURFACE WATER

☐ 4. WELL

* Paluxy Sand Aquifer (2,500 feet)

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X. WATER AND HYDROLOGICAL DATA (continued)**H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE**

1. WELL	2. DEPTH (specify unit)	3. LOCATION (proximity to population/buildings)	4. NON-COM- MUNITY (mark 'X')	5. COMMUN- ITY (mark 'X')
None				

I. RECEIVING WATER

1. NAME

Unnamed tributary of
Muddy Creek☐ 2. SEWERS☒ 3. STREAMS/RIVERS☒ 4. LAKES/RESERVOIRS☐ 5. OTHER (specify) _____**6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS**

Muddy Creek flows into Lake Ray Hubbard, Segment 0820 of the East Fork Trinity River
Contact and non-contact recreation, propagation of fish/wildlife, domestic raw
water supply

XI. SOIL AND VEGETATION DATA

LOCATION OF SITE IS IN.

☐ A. KNOWN FAULT ZONE☐ B. KARST ZONE☒ C. 100 YEAR FLOOD PLAIN☐ D. WETLAND

SE corner of property only

☐ E. A REGULATED FLOODWAY☐ F. CRITICAL HABITAT☐ G. RECHARGE ZONE OR SOLE SOURCE AQUIFER**XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED**

Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts.

'X'	A. CVERBURDEN	'X'	B. BEDROCK (specify below)	'X'	C. OTHER (specify below)
	1. SAND				
X	2. CLAY				
	3. GRAVEL				

XIII. SOIL PERMEABILITY☐ A. UNKNOWN☐ B. VERY HIGH (100,000 to 1000 cm/sec.)☐ C. HIGH (1000 to 10 cm/sec.)☐ D. MODERATE (10 to .1 cm/sec.)☐ E. LOW (.1 to .001 cm/sec.)☒ F. VERY LOW (.001 to .00001 cm/sec.)**G. RECHARGE AREA**☐ 1. YES☒ 2. NO

3. COMMENTS

H. DISCHARGE AREA☐ 1. YES☒ 2. NO

3. COMMENTS

I. SLOPE

1. ESTIMATE % OF SLOPE

1-2 percent

2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.

East-southeasterly

J. OTHER GEOLOGICAL DATA

The Cretaceous-Gulf series directly underlies the site followed by the lower Comanche series, dipping to the southeast. The majority of the Gulf and upperpart of the Comanche series are clays, marls, limestones, chinks, and shales, which in general, are not water-bearing media. Stratigraphy in the deeper Comanche series includes the Paluxy Formation (depth 2600') and the Glen Rose and Twin Mountains Formations. (See Att. A)

XIV. PERMIT INFORMATION

List all applicable permits held by the site and provide the related information.

A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yr.)	E. EXPIRATION DATE (mo., day, & yr.)	F. IN COMPLIANCE (mark 'X')		
					1 YES	2 NO	3 UN- KNOWN
NONE, See Attachment A							

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS
☐ NONE ☒ YES (summarize in this space)

Previous enforcement activities have resulted from TDWR solid waste compliance inspections conducted on 7/5/79, 2/19/80, 4/22/80, and 9/25/80. Items of enforcement have included unauthorized on-site land application of Class I wastes, inadequate storm water runoff control, and improper disposal of barrels in undiked areas.

The facility is currently under enforcement action by TDWR. The most recent enforcement report from District 4 is included herein as Attachment B.

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition (Section II) information on the first page of this form.

RCRA 3012 SITE INSPECTION COMMENTS
CHEMICAL RECYCLING, INC.
WYLIE, TEXAS
TX02496

INTRODUCTION

On February 16, 1984, Robert H. Davis, Jr. and Russell S. Dykes of Engineering-Science, Inc. (ES) conducted a RCRA 3012 site inspection of Chemical Recycling, Inc. in Wylie, Texas. The inspectors met with the company president, J.R. (Bob) Siemoneit and the plant manager, Gerald G. Brock. The inspection lasted approximately four hours and consisted of an interview, review of records, site surveillance, and the collection of samples.

OPERATIONS

Chemical Recycling, Inc. has existed at the present location since the fourth quarter 1975. Previous uses of the site included a municipal landfill and a porcelain product manufacturing facility. Less than five workers are employed at present. The plant receives spent paint solvents, printing ink solvents, and chlorinated degreasing solvents in drums and bulk form from industries, with paint waste solvents accounting for at least 95 percent of the incoming material. The solvents are reclaimed by distillation. The product is stored in above-ground storage tanks and eventually sold back to the source companies for reuse. Two trucks are maintained at the site for transporting bulk and drummed solvents.

WASTE MANAGEMENT PRACTICES

Boiler blowdown and wastewater from the distillation process is allowed to flow in an open channel away from the process area into an open catchment basin before being discharged to the sanitary sewer. The city of Wylie STP is operated by the North Texas Water District. The catchment basin and channel leading to it are not lined and also receive spillage and runoff from the process area slab and washdown water from the periodic cleaning of the company trucks.

The second waste type generated is still bottoms from the process units.

Mr. Siemoneit contended that these waste solids are not hazardous; however, they are listed as Class IH in the solid waste registration. Approximate annual quantities generated are as follows (source: TDWR Part A Application, submitted August 1983):

Still bottoms - paint waste units	350,000 lbs
Still bottoms - ink solvent unit	7,000 lbs
Still bottoms - degreasing solvent unit	1,250 lbs

The waste solids are stored on-site in 55-gallon drums prior to resale or disposal at a Class I landfill. Prior to 1980, portions of the waste solids had been applied to surface soils in the yard to serve as road material as it hardened.

SURVEILLANCE AND SAMPLING ACTIVITIES

Following the interview, a number of records were viewed at the facility, including shipping tickets and waste summaries for 1982-83. Information regarding solvent generators, waste transporters, and off-site disposers was copied. Mr. Siemoneit furnished analytical results of an extraction test performed by a private lab on the paint still bottom waste material which indicated that only trace levels of Pb and Zn were leached.

Photographs were taken during the site surveillance. An estimated 1,500 drums were observed in various arrays in the yard, many in undiked areas. Of this number, about 200 drums were noted on or near the process area slab, containing both incoming solvents and still bottom wastes. Immediately to the east of the process area on pavement were another 200 drums containing still bottoms awaiting off-site disposal. A sample of this waste material was collected. Analysis for three metals by total digestion revealed that the sample contained 4,820 ppm Pb, 1,080 ppm Cr, and 311 ppm Zn. It also contained trace amounts of numerous organic species (many unidentified), including 4.1 ppm xylene. Mr. Siemoneit indicated that currently no still bottoms were being generated from the degreasing solvent and ink solvent process units.

Approximately 700 drums were observed in an unpaved open area along the western edge of the property. Mr. Siemoneit stated that they contained dried paint still bottoms which he expected to sell to a sealant manufacturer for incorporation into product.

Immediately to the north of the process area, two inactive concrete drying beds filled with rainwater were observed. These beds are several feet in depth and have been inactive for several years, but still contain waste solids beneath the rainwater, according to the TDWR District field representative. Less than a foot of freeboard was observed.

We then proceeded to the area of the plant which had at one time been used for land application of still bottom wastes. Mr. Siemoneit indicated that portions of the soil had been removed to a Class I landfill in 1980 following TDWR enforcement. The surface soils in this area were observed to be dark and crusty, with approximately 50 percent of the area covered with vegetation. A surface soil sample collected in this area showed elevated levels of Pb, Zn, and Cr (28, 10, and 8 times greater than background levels, respectively).

The tank farm was viewed next. This area was diked and had standing water in the southeast corner and near the manual drain valve at the inside of the east berm. Mr. Siemoneit stated that the valve was opened only to relieve rainfall accumulation. The underground pipe discharged approximately 30 feet to the east in the designated drum storage area. A sample of the standing water taken from near the drain valve indicated that significant spillage of organics had occurred in the tank farm area. The water sample was determined to be hazardous by EP Toxicity criteria (Pb, 5.3 mg/l) and contained significant levels of identified alkylated and chlorinated organics (concentration range, 11.5 - 81.8 mg/l). Numerous unidentified organics were also determined to be present.

The drum storage area contained 200 to 300 drums in various conditions and content levels. Some were laying on their sides. Areas of spillage and leaking drums were noted, predominantly of paint wastes. Mr. Siemoneit informed us that at one time the area contained some 1,200 drums, most of which had been removed to a Class I landfill. This area is bounded by a poorly defined dike (lowest side, east) with estimated dimensions of 80' x 200'. Standing water with an oily film was noted in the southeast corner. A sample of this water showed the presence of numerous organics (many unidentified), including 4.52 mg/l of 1,2-dichloroethane. Some ponded water was also noted on the north part of the drum storage area.

A drainage ditch borders the east side of the property. Runoff from the majority of the site flows into this ditch and eventually to Lake Ray Hubbard

to the south. The site also contains a small natural pond on the east side (central) which is now heavily ingrown with vegetation. The water level was very low at the time of the inspection.

Additional samples were collected from the unlined catchment basin which receives steam condensate, process spillage and process area runoff. Sediment in this basin was determined to contain Pb, Zn, and Cr which exceeded background soil levels by 71, 6, and 18 times, respectively. Numerous identified and unidentified organics were also present in the sediment, including 940 mg/kg of 1,1,1-trichloroethane and significant levels of other chlorinated and non-chlorinated species. A sample of the water in this basin indicated a pH of 11.5 and also numerous organics, including 820 mg/l of 1,2-dichloroethane and 28.8 mg/l of benzene.

The collection of off-site samples included standing water and sediment from the eastern adjacent ditch which conveys uncontained site runoff to a tributary of Muddy Creek. The sediment in this ditch had levels of Pb, Zn, and Cr which exceeded background soil levels by 27, 3, and 6 times, respectively. Water in the ditch was found to contain insignificant levels of metals but measurable concentrations of various identified and unidentified organic species.

ASSESSMENT

This site is currently under enforcement action by TDWR. A copy of the technical recommendations for enforcement, prepared by the TDWR field inspector of District 4 and dated March 14, 1984, is included with this report as Attachment B.

Although the catchment basin, tank farm, and areas of drum storage are unlined, soils in the area are of "low" permeability (USDA/SCS Soil Survey - value not given) such that migration of waste components to underlying groundwater systems is probably retarded and possibly contained. A more extensive subsurface investigation would reveal site specific soil conditions and better define the extent of contaminant transport.

The major problem appears to be runoff contamination by contact with spill areas. Runoff drains eastward to a tributary of Muddy Creek. The tank farm drains to the drum storage area which is subject to overflowing at the

southeast corner during periods of heavy rainfall. Significant levels of metals above background and specific organics were determined to be present in surface soils and standing water at the site and immediately adjacent to the site in the path of runoff. While many of the organic species were quantified, the analytical results indicated that other, unidentified compounds are also present and subject to movement off-site.

In addition, the catchment basin is connected by pipeline to the sanitary sewer. The water in this basin is heavily contaminated with organics originating in the process area. Although diluted when combined with municipal sewage, it is possible that many of these species will resist conventional treatment and eventually be discharged to the receiving waters (Muddy Creek).

A medium degree of apparent hazard has been assigned to this site, based on the results reported above.

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-3.

Corresponding number on form	Additional Remark and/or Explanation			
III D	<u>Generator Information (Continued)</u>			
	Rockwell, Int.	214/996-5205	1200 N. Alma Rd. Richardson, TX 75081	Chlorinated hydrocarbons, misc. solvents
	Varo Semiconductor	214/271-8511	1000 N. Shiloh Rd. Garland, TX 75042	Misc. solvents
	Glidden Coating and Resin	214/242-5141	1900 Josey Ln. Carrollton, TX 75006	Paint wastes
	Southland Paint Co.	817/668-7271	1101 Southland Dr. Gainesville, TX 76240	Paint wastes
	Printpack, Inc.	214/641-4421	2006 S. Great SW Parkway Grand Prairie, TX 75051	Printing ink
	Koppers Co., Inc. Organic Mat'ls Group	214/438-1913	801 E. Lee St. Irving, TX 75060	Paint wastes
XIII J	TDWR Report 198, 1976, p. 6-11 and TDWR Report 219, Figure 36 (Section B-B').			
XIV	<u>Permit Information:</u> The facility does not hold wastewater discharge or air permits. It is allowed by the City of Wylie to discharge steam condensate wastewater to the sanitary sewer. The EPA ID No. is TX053131223. On July 10, 1981, the company received RCRA interim status as a treatment and storage facility. The TDWR solid waste registration no. is 32355.			
XV	Previous enforcement activities have resulted from TDWR solid waste compliance inspections conducted on 7/5/79, 2/19/80, 4/22/80, and 9/25/80. Items of enforcement have included unauthorized on-site land application of Class I wastes, inadequate stormwater runoff control, and improper disposal of barrels in undiked areas.			

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-3.

Corresponding
number on form

Additional Remark and/or Explanation

VII D

The following metals and organics were determined to be present at the site in surface soil or standing water samples. Concentrations given are the highest observed for a given analyte in any media.

<u>Substance</u>	<u>Form</u>	<u>Toxicity</u>	<u>CAS No.</u>	<u>Observed Concentration</u>
Lead	Sol	Med	7439-92-1	2,330 mg/kg
Chromium	Sol	Med	7440-47-3	483 mg/kg
Zinc	Sol	Low	7440-66-6	925 mg/kg
Benzene	Liq	Med	71-43-2	28.8 mg/l
1,2-dichloroethane	Liq	Med	107-06-2	820 mg/l
1,1,1-trichloroethane	Liq	Low	71-55-6	940 mg/kg
1,1-dichloroethane	Liq	Med	75-34-3	7.0 mg/kg
1,1-dichloroethylene	Liq	Med	75-35-4	.054 mg/l
Ethylbenzene	Liq	Med	100-41-4	420 mg/kg
Methylene chloride	Liq	Med	75-09-2	52 mg/kg
Bromoform	Liq	Med	75-25-2	12.6 mg/l
Tetrachloroethylene	Liq	Low	127-18-4	37.6 mg/l
Toluene	Liq	Low	108-88-3	260 mg/kg
Trichloroethylene	Liq	Med	79-01-6	280 mg/kg
Xylenes (o,m,p)	Liq	Low	1330-20-7	47.7 mg/l

ATTACHMENT B

Enforcement Report on subject facility
by TDWR District 4 Personnel

(3/14/84)

INVESTIGATION REPORT

Chemical Recycling, Inc.
Registration No. 32355
P. O. Box 947
Wylie, Texas 75098

I. Introduction

A. Identification:

Chemical Recycling, Inc.
802 Kirby Street
Wylie, Texas 75098

B. List of Permits and Registrations:

Industrial Solid Waste Registration
No. 32355; Hazardous Waste Permit
Application No. 50053-001

C. Permit Provisions:

No permit, applying for a commercial hazardous waste storage permit.
Facility does not satisfy the requirements for interim status.

D. Background Information:

An industrial solid waste management inspection was conducted on December 9, 1983 by Sandra Antoinette (TDWR - District 4) and Pam Jupe (TDWR - Central Office). Company representatives at the inspection were J. R. Siemoneit (Owner) and Jerry Brock (Plant Manager).

Chemical Recycling, Inc. is a privately owned facility located at 802 Kirby Street, Wylie, Texas. Operation at this location began in 1975. Prior to 1975, Chemical Recycling, Inc. was located at 1400 N.W. Highway, Dallas, Texas.

The Wylie facility is currently providing solvent reclamation services on a commercial basis. The generators of the spent solvents enter into a contractual agreement that obligates them to repurchase the solvents after distillation.

Chemical Recycling, Inc. provides transportation of the waste solvents utilizing a flatbed truck or a 200-gallon tank truck. Their service area encompasses Dallas and Fort Worth with some shipments originating from Gainesville and Tyler.

The solvents are recycled at the facility through a distillation process. Both halogenated and non-halogenated solvents are accepted for processing.

Three stills are utilized in the process, with each having a capacity of 2,000 gallons. Still bottoms are generated from all three units. The sludges from the ink still (F003) and the chlorinated solvent still

(F001) are shipped for off-site disposal on a regular basis to either Eltex Chemical and Supply in Houston or Chemical Waste Management. This was verified by the company's manifests. The paint thinner still bottoms (F005) are being retained on-site in hopes that they can be utilized by another company in the production of a caulking compound. According to Mr. Siemoneit, several test drums were sent to a company without a manifest. The company conducting the research is not authorized by this agency to accept that waste. The company's name was not divulged, but only that they were located in Irving.

In 1979, Mr. Siemoneit landfarmed his processed still bottoms on-site without proper authorization from this agency. At the request of this agency, the contaminated soil was removed and transported to an authorized disposal facility.

II. Waste Handling Facility

A. Type of Facility

Commercial.

B. Description of Facility

Chemical Recycling, Inc. bought five acres from the City of Wylie for the plant site. Before that time, it was utilized as a municipal landfill.

The property presently supports the following facilities:

1. Concrete-lined basin (photo #19)

A concrete below-grade basin (15 feet by 25 feet by 2 feet), was used in the past as a drying bed for the processed still bottoms. It was only utilized for the first three weeks of production because the method of drying proved unsuccessful.

At the time of the inspection, the inactive drying beds were full of sludge and contaminated rainwater. The sludge has remained in the basin for approximately nine years. In order to prevent an overflow of contaminated rainwater, Mr. Siemoneit uses a flexible rubber hose to divert the water from the basin to the earthen pit, thence to the City of Wylie sanitary sewerage system.

2. Four separate drum storage areas (photos #6, #7, #11, #12, #14, #17, #18) are located on the facility's property (refer to sketch)

- (a) The northwest section of the site (former landfarm area) is being used to store approximately (500) five-hundred 55-gallon drums of still bottoms from the distillation of paint thinners.

- (b) Approximately (400) four-hundred more 55-gallon drums of paint thinner still bottoms are randomly located on the northeast section of the property. Soil contamination from the leaking drums was noted throughout the area. One particular area, north of the product tank farm, looked as though an entire drum had been turned over (refer to photo #17).

The majority of drums that contained the paint thinner still bottoms were in poor condition.

- (1) Many of the drums were rusted, with some being completely rusted through.
 - (2) Some of the drums showed signs of bulging.
 - (3) Majority of the drums were not properly sealed.
 - (4) No drums had hazardous waste labels on them.
 - (5) Drums along the eastern boundary were sitting in standing water.
- (c) The third drum storage area is located on a concrete slab that is east of the process area (photos #11 and #12). This area is used to store the chlorinated and ink still bottoms. Approximately two-hundred 55-gallon drums were being stored on-site at the time of the investigation. All of these drums appeared to have the proper hazardous waste labels.
 - (d) Empty drums comprise the fourth drum storage area. The empty drums were located just north of the office building and along the southeast fence line. These drums are stored on their sides with no tops and the contents spilling onto the ground and into a small drainageway. Residue from the empty drums is resulting in soil and water contamination in the area. Approximately 1,000 drums were being stored on-site.

3. Waste storage tanks (photo #10)

The tanks are used to store spent wastes and still bottoms. Currently eight (8) tanks are being used for this purpose. Refer to the site sketch for approximate locations.

- (a) Spent ink solvents are stored in two (2) 790-gallon storage tanks. The first one is located just west of the process area, off of the concrete slab. The second tank is situated near the southeast corner of the process area on concrete without curbing. At the time of the inspection, a leaking valve was observed on the second tank. It was apparent that

this valve has been leaking for quite some time because not only the concrete but the surrounding soil has been discolored purple.

- (b) Spent paint thinners are stored in three (3) 2,000-gallon above-ground tanks. Two of these tanks are located on concrete in the process area without curbing. The third 2,000-gallon tank is just west of the area, off the concrete slab. A fourth tank, with the capacity of 790 gallons, was full of paint thinner still bottoms that have been on-site for nearly ten years.
- (c) A 2,000-gallon tank is used to store the spent chlorinated solvents. This particular tank is located on the southwest corner of the process area.

Although the process area is concreted, diking around this area is absent. If a spill did occur, it would drain into the unlined earthen pit via an unlined earthen ditch.

4. Unlined earthen pit and drainage ditch (photos #8 and #9)

The purpose of this drainage ditch and earthen pit is to contain any spills from the adjacent process area. This method of spill control was implemented in lieu of diking. The pit measures approximately 12 feet by 18 feet by 5 feet. The entire area showed signs of contamination which originates in the process area (refer to photos #8, #9, and #13).

The basin is connected to the sanitary sewer for the discharge of contaminated rainwater from the concrete lined basin and any contaminated washwater that is generated from their truck washing operation. A four-inch pipe is located on the northeast corner of the pit. This pipe extends approximately four feet from the bottom of the pit with the top one foot being screened. When the level of fluids in the pit reaches the screened portion of the pipe, it is discharged to the sanitary sewer. The liquid portion in the pit that does not reach the screened pipe will remain to either evaporate or seep into the ground.

5. Product tank farm (photos #15 and #16)

It consists of thirteen (13) tanks that range in size from 2,000 to 8,000 gallons.

Tanks #1 through #6	-	2,000 gallons each
Tank #7	-	4,000 gallons
Tank #8	-	6,000 gallons
Tanks #9 through #11	-	8,000 gallons each
Tanks #12 and #13	-	3,000 gallons each

The tank storage area is approximately 50 feet by 30 feet with only concrete pads under the storage tanks. The remaining area is unprotected soil with an earthen dike around the area. There is evidence of spilled material inside the storage area.

III. Water Quality Impact

A. Surface Water

The surface topography of the property dips slightly to the east resulting in any storm runoff flow to the east side of the property. There are several contaminated areas throughout the facility where storm runoff could carry contaminants off-site. Water in the ditch on the east side of the facility is discolored.

Also, boiler blowdown is discharged to the roadside ditch at the south end of the property. Twice a day, approximately 20 gallons of boiler blowdown is discharged to the roadside ditch.

B. Groundwater

In the writer's opinion, seepage of contaminated rainwater and washwater from the unlined earthen pit is a threat to the groundwater. Since the entire site is situated atop a closed landfill, a contamination plume could filter out in a number of directions. Soil borings around the pit could confirm if any leaching is taking place.

IV. Previous Enforcement Action and Complaints

An enforcement report was submitted on February 29, 1980 by Billy Roy Smith of District 4. The facility was disposing of still bottoms by landfarming which was not authorized by this agency.

V. Violations

<u>Violation</u>	<u>Data Source</u>	<u>Permit or Other Requirements</u>
1. No waste analysis plan	12/9/83	TAC 335.114
2. No general inspection requirements including tanks, drum storage, and chemical processing	12/9/83	TAC 335.116
3. No personnel training	12/9/83	TAC 335.117

4. No preparedness and prevention plan	12/9/83	TAC Subchapter F
5. No contingency plan	12/9/83	TAC Subchapter G
6. No operating record	12/9/83	TAC 335.173
7. No closure plan and closure cost estimate	12/9/83	TAC Subchapter J and 335.173
8. No financial assurance	12/9/83	TAC Subchapter K
9. No permit for TSD facility	12/9/83	TAC 335.2(g) and Subchapter V
10. General prohibitions	12/9/83	TAC 335.4
11. Shipping waste to an unauthorized facility	2/24/84	TAC 335.2b
12. Improper management of containers	12/9/83	TAC 335.242, .243, .244(a)(b), .246
13. No groundwater monitoring for surface impoundment	12/9/83	Subchapter I
14. Unauthorized wastewater discharge	12/9/83	Water Code 26.121
15. Inadequate security and danger signs	12/9/83	TAC 335.115
16. Inadequate number of "No Smoking" signs posted	12/9/83	TAC 335.118

VI. Causes of Violation

1. The company has not implemented a waste analysis plan.
2. The company has not developed any general inspection procedures with a written inspection log. This should also include the tank and drum storage areas, and chemical-physical processing area.
3. The company has not developed or implemented a personnel training program.
4. The company has not developed a preparedness and prevention plan.
5. The company has not developed a contingency plan.

6. The company has not developed or implemented an operating record.
7. The company has not devised a closure plan including closure cost estimate for the facility.
8. The company has not obtained any type of financial assurance.
9. The facility is operating without a permit.
10. Contaminated storm runoff could be discharged from several locations at the facility.
11. Still bottoms generated by Chemical Recycling have been transported, unmanifested, to an unauthorized facility.
12. During the December 9, 1983 inspection, several drums were rusty, bulging, and several were not properly closed. Also, drums were being stored within 50 feet of the company's property line.
13. The company maintains an earthen pit prior to wastewater being discharged to the sanitary sewerage system. Also, numerous spills have occurred through the facility (process area, empty drum storage area, product storage area, and drum storage area).
14. The company discharges its boiler blowdown into the roadside ditch.
15. The facility is not fenced in all areas and no warning signs are posted.
16. The company has not posted any "No Smoking" signs in the process area, drum storage area, or tank storage area.

VII. Technical Recommendations

1. Within 30 days, the company shall develop and implement a waste analysis plan in accordance with TAC 335.114.
2. Within 30 days, the company should develop and implement general inspection plan and inspection log in compliance with Rules 335.116, .245, .264, and .404.
3. Within 30 days, the company should develop and implement procedures to comply with Rule 335.117 - personnel training.
4. The company shall within 60 days develop and implement a preparedness and prevention plan to comply with Subchapter F of TAC.
5. The company shall within 60 days develop and implement a contingency plan to comply with Subchapter G of the TAC.

6. Within 30 days, the company shall develop and implement a written operating record to comply with Rule 335.173.
7. The company shall develop a closure plan, including closure cost estimate, for this facility within 45 days to comply with Subchapter J.
8. The company shall comply with Subchapter K within 90 days concerning financial assurance.
9. The company should submit all required information concerning Part A and Part B Permit Applications as requested by this agency.
10. All contaminated rainwater and washwater should be collected immediately and disposed of at an authorized facility.
11. All wastes going off-site shall be shipped to an authorized disposal site and must be accompanied by a manifest, effective immediately.
12. The company shall, within 30 days, take the necessary steps to redrum any waste contained in leaking, bulging, or rusty drums, close any open top drum, replace missing bungs on all drums, and relocate all drums to a location greater than 50 feet from the company's property line.
13. The company will develop and implement a groundwater monitoring program as required by Subchapter I with the exception of sampling frequency which should be substituted with the accelerated sampling schedule. In lieu of a groundwater monitoring program, the company could submit a detailed closure plan for the earthen pit, drum storage area, tank storage area, process area, and product storage that would assure the removal of all contamination from these or any other contaminated area prior to permit issuance.
14. The company shall within 30 days eliminate the boiler blowdown discharge.
15. The company shall within 60 days provide adequate fencing around the entire facility and shall provide an adequate number of warning signs.
16. The company shall within 30 days post "No Smoking" signs throughout the facility including the drum storage area, tank storage area, and the process area.

Chemical Recycling, Inc.
Registration No. 32355

COMMENTS

Generator's Checklist

Section A

- #3) A hazardous waste determination has not been made on the facility's empty drums.
- #4) The facility's registration needs to be updated to include the following:
 - A. boiler blowdown - unauthorized discharge,
 - B. truck washings - sanitary sewer,
 - C. contaminated rainwater - sanitary sewer and unauthorized discharge,
 - D. empty drums - on-site/off-site, and
 - E. wastes #001 and #003 are the same thing.

Section C

- #1) Only 1982 and 1983 records were available for review. According to Jerry Brock (Plant Manager), the 1981 files were stored elsewhere.
- #2) The registration states that the paint thinner still bottoms (waste #001) are being disposed of off-site., This is not the situation. Approximately 50,290 gallons of (F005) sludge have been retained on-site.
- #3) Numerous spills have occurred on the plant premises, which is mainly due to leaking drums. Boiler blowdown contaminated rainwater and truck washings are discharged to sanitary sewerage system.

Section D

- #2) Waste (F005) still bottoms were sent to an unauthorized facility in Irving, Texas without a manifest.
- #7) The drums of paint thinner still bottoms were not marked with the required hazardous waste label.
- #9) No inspections are conducted of the drum storage area and tank storage.
- #10) Contents of leaking drums are not being transferred to a suitable drum.
- #11) The paint thinner still bottoms (F005) are listed in the Federal Register as being ignitable. Many of the drums containing F005 are located adjacent to the property line.

Chemical Recycling, Inc.
Registration No. 32355

#13) The waste drum storage areas are not all located on an impervious base.

Facilities Checklist

Section A

#1) Chemical Recycling, Inc. has not provided deed recordation for the unlined earthen pit, that is used for treatment prior to discharge to sanitary sewerage system. Boiler blowdown has continued to be discharged on the property grounds.

Section B

#1) Facility does not have a waste analysis plan.

#3a) According to Mr. Siemoneit, a sample of the customer's spent solvent is taken and analyzed for boiling point, solubility in water, and solids content.

#3b) Standard methods are used to test the representative sample.

#3c) A grab sample is taken with a 16 oz. glass jar (coke bottle).

#3d) The initial analysis is repeated only when the customer's process has changed.

#3e) Some of the facility's customers have supplied data sheets on the chemicals that they use.

(3f) No specific procedures are being used to inspect and analyze each movement of hazardous waste. Operation appears to be very disorganized.

#4) The facility is not completely fenced. Along the east side of the property, a 20 foot-30 foot section of fence was removed to gain vehicle access to the property.

Section C

#1) Chemical Recycling has no inspection schedule and log.

Section D

No personnel training or records are maintained at the facility.

Section E

#1b) No smoking signs are not posted in the process area. The drums of paint thinner still bottoms are both ignitable and toxic. Railroad tracks are located near the northern property boundary. If a grass fire ever resulted from a passing railroad car, it could easily spread to the referenced property where the ignitable wastes are stored.

Chemical Recycling, Inc.
Registration No. 32355

Section F

No preparedness and prevention plan has been implemented by this facility.

Section G

No contingency plan has been drafted by Chemical Recycling, Inc.

Section H

- #1-5) In reviewing the incoming manifests, only one discrepancy was noted. The transporter's copy of manifest #00481398 could not be provided. All other shipments of incoming waste appear to be consistent with the manifests and monthly reporting.
- #6) Facility does not maintain an operating log.
- #7e) No closure cost estimates have been developed to adequately close the facility.
- #8) No closure plan has been developed for the facility.
- #9) If the unlined earthen pit is to remain on-site, then the company will be responsible for maintaining an adequate post-closure plan and groundwater monitoring.
- #10) Facility has no financial assurance.

Tank Checklist

Section A

The tank that contained the spent ink solvent was leaking at the time of inspection.

Section C

No inspection logs are kept on any of the storage facility.

Transporters Checklist

Section A

For the most part, Chemical Recycling, Inc. ensures that the transporter's portion of the manifest is completed properly. The "no" answers for questions #1, #3, #4 and #5 are referring to the missing transporter's copy of the manifest #00481398. Company has made no attempt to locate the missing document.

Chemical Recycling, Inc.
Registration No. 32355

Section F

Truck washing operations are conducted on-site. The contaminated washwater is processed in the unlined earthen pit prior to discharge to sanitary sewerage system.

Section G

Hazardous and industrial solid waste are being disposed of on-site. Mr. Siemoneit has been advised by district personnel in the past to cease that practice.

TANK FARM AND DRUM STORAGE AREA

STORAGE FACILITIES SITE INSPECTION REPORT
(Supplemental Report)INSTRUCTION
Answer and Explain
as Necessary.

1. STORAGE AREA HAS CONTINUOUS IMPERVIOUS BASE

☐ YES ☒ NO

STORAGE AREA HAS A CONFINEMENT STRUCTURE

☒ YES ☐ NO Diking, minimum height 2 feet

3. EVIDENCE OF LEAKAGE/OVERFLOW (If "Yes", document where and how much runoff is overflowing or leaking from containment)

☒ YES ☐ NO

Tank farm stormwater drains by underground pipe (valved) to drum storage area

4. ESTIMATE TYPE AND NUMBER OF BARRELS/CONTAINERS

200 - 300 55-gallon drums estimated

5. GLASS OR PLASTIC STORAGE CONTAINERS USED

☐ YES ☒ NO

6. ESTIMATE NUMBER AND CAPACITY OF STORAGE TANKS

13 storage tanks in farm; size range: 2000-8000 gallons

7. NOTE LABELING ON CONTAINERS

Vast majority of drums were not labeled. Labels noted included:

111 trichloroethane	silicone surfactant
Varsol	trichlorotrifluoroethane
Dioxane	Acetone
MEK	Aropol
Waste solvent	Methylene chloride
Isopropyl alcohol	

EVIDENCE OF LEAKAGE CORROSION OR BULGING OF BARRELS/CONTAINERS/STORAGE TANKS (If "Yes", document evidence. Describe location and extent of damage. Take PHOTOGRAPHS)

☒ YES ☐ NO

- Leakage and corrosion noted during inspection
- A few barrels were overturned inside diked drum storage
- See photos

9. DIRECT VENTING OF STORAGE TANKS

☒ YES ☐ NO

10. CONTAINERS HOLDING INCOMPATIBLE SUBSTANCES (If "Yes", document evidence. Describe location and identity of hazardous waste. Take PHOTOGRAPHS.)

☐ YES ☒ NO

11. INCOMPATIBLE SUBSTANCES STORED IN CLOSE PROXIMITY (If "Yes", document evidence. Describe location and identity of hazardous waste. Take PHOTOGRAPHS.)

☐ YES ☒ NO

12. ADEQUATE CONTAINER WASHING AND REUSE PRACTICES

☐ YES ☒ NO

3. ADEQUATE PRACTICES FOR DISPOSAL OF EMPTY STORAGE CONTAINERS

☐ YES ☒ NO Most are removed to drum reconditioner or metals dealer, but some remain at site

ENGINEERING-SCIENCE, INC.
SITE INSPECTION TEAM
SITE SAFETY AND WORK PLAN

A. GENERAL INFORMATION

SITE: CHEMICAL RECYCLING INC. (aka J R. Siemoneit) HAZSIT NO.: TX02496
LOCATION: 802 Kirby St. Wylie, Texas 75098 (214) 412-1212
PLAN PREPARED BY: David G. Johnson, P.E. DATE: 2/7/84
APPROVED BY: _____ DATE: _____
OBJECTIVE(S): Review records, particularly shipping tickets. Establish site history and present status with respect to RCRA. Sample on-site soils in landfarm area, old landfill, and spill areas. Sample water and/or soils in off-site drainage ditch. Analyses should include TOC, TOX, Pb, Cr, Zn. Pay particular attention to on-site runoff control.
PROPOSED DATE OF INVESTIGATION: Week of February 13, 1984
PRELIMINARY ASSESSMENT HAZARD: HIGH: _____ MEDIUM: X LOW: _____
NONE: _____ UNKNOWN: _____

B. SITE/WASTE CHARACTERISTICS

WASTE TYPE(S): LIQUID: _____ SOLID: X SLUDGE: X GAS: _____
CHARACTERISTIC(S): CORROSIVE: _____ IGNITABLE: X RADIOACTIVE: _____
VOLATILE: _____ TOXIC: X REACTIVE: _____
UNKNOWN: _____ OTHER: X (NAME) Flammable
FACILITY DESCRIPTION: 5 acre facility involved in waste paint solvent reclamation. Solvents are reclaimed through a distillation process.

Principal Disposal Method (type and location): Waste sludges were landfarmed (now inactive) some off-site shipments. On-site drum storage. wastewater discharged to city sewer.

Unusual Features (dike integrity, power lines, terrain, etc.): A portion of the site was formerly used by the City of Wylie as a municipal landfill.

Status: (active, inactive, unknown): active

History: (worker or nonworker injury, complaints from public, previous remedial or enforcement agency): As a result of several meetings and inspections during 1980, the company supposedly removed contaminated soils, established a single drum storage area, and made on-site changes to reduce off-site contaminated runoff. At one time, waste sludges were shipped back to generators without shipping tickets. Company applied for solid waste permit in mid-1980.

C. HAZARD EVALUATION

Part A application lists wastes F001, F003, F005, K078 handled on-site

D. SITE SAFETY WORK PLAN

PERSONAL PROTECTION

LEVEL OF PROTECTION: A _____ B _____ C _____ D x

MODIFICATIONS: _____

SURVEILLANCE EQUIPMENT AND MATERIALS: _____

SITE ENTRY PROCEDURES: *contact facility representatives to arrange inspection date*

DECONTAMINATION PROCEDURES: _____

Special Equipment, Facilities, or Procedures: _____

<u>Team Member</u>	<u>Responsibility</u>
<i>Bob Davis</i>	<i>Lead inspector</i>

E. EMERGENCY INFORMATION

LOCAL RESOURCES

Ambulance: _____

Hospital: _____

Poison Control Center: _____

Police: _____

Fire Department: _____

EPA Contact: _____

TDWR Contact: Daniel L. Scheppers (512) 475-1344

Emergency Contacts:

Project Safety Manager: Dr. Barry North (303) 455-4427

Project Manager: David G. Johnson (512) 477-9901 892-3755


F. EMERGENCY ROUTES

HOSPITAL: _____

OTHER: _____

CHEMICAL RECYCLING, INC
(AKA JR SIEMONEIT)

WYLIE, TEXAS
FEBRUARY 16, 1984

 SAMPLING LOCATIONS
DRAWN NOT TO SCALE



ENGINEERING—SCIENCE, INC.

924 GEMINI BOULEVARD, HOUSTON, TEXAS 77058 (713) 488-3004

Engineering-Science, Inc.
2901 N. Interregional
Austin, Texas 78722

LABORATORY RESULTS

ES PROJECT NO. 8073.99

DATE SAMPLE RECEIVED 2-21-84

DATE DATA TRANSMITTED 6-04-84

Attn: R. H. Davis

CLIENT JOB REFERENCE IX 02496

ES SAMPLE NUMBER	CLIENT IDENTIFICATION	Pb ug/g	Zn ug/g	Cr ug/g
4718	¹ Background Surface Soil	33	95	27
4719	¹ Surface Soil - landfill area	919	925	229
4722	¹ Solid Waste from top of drum	4820	311	1080
4723	¹ Sediment from catchment basin	2330	560	483
4726	¹ Vegetated sediment in ditch off-site	902	325	161

RECEIVED
E. AUSTIN

¹ Metals reported on a dry weight basis

JUN 6 1984



APPROVED FOR TRANSMITTAL


LABORATORY MANAGER

ENGINEERING—SCIENCE, INC.

924 GEMINI BOULEVARD, HOUSTON, TEXAS 77058 (713) 488-3004

LABORATORY RESULTS

Engineering-Science, Inc.
2901 N. Interregional
Austin, Texas 78722

ES PROJECT NO. 8073.99

DATE SAMPLE RECEIVED 2-21-84

DATE DATA TRANSMITTED 6-02-84

Attn: R. H. Davis

CLIENT JOB REFERENCE TX 02496

ES SAMPLE NUMBER	CLIENT IDENTIFICATION	Pb mg/L	Zn mg/L	Cr mg/L
4720	Standing water in tank farm	5.3	18.6	1.2
4721	Standing water in drum storage	0.2	0.11	< 0.05
4724	Water from catchment basin	0.2	0.09	< 0.05
4725	Standing water in ditch off-site	< 0.2	0.08	< 0.05



APPROVED FOR TRANSMITTAL


LABORATORY MANAGER

LABORATORY RESULTS

CLIENT: TDWR TX 02496

DATE RECEIVED: 2-21-84

Parameter	Sample I.D.	1	1	
		waste -	sediment -	
		top of	catchment	
		drum	basin	
	ES #	4722	4723	
	Units	ug/g	ug/g	

Benzene	0.12	22.5	
Carbon tetrachloride			
Chlorobenzene	< 0.05		
1,2 - Dichloroethane	0.4	570	
1,1,1 - Trichloroethane		940	
1,1 - Dichloroethane		7.0	
1,1,2 - Trichloroethane			
Chloroform			
1,1 - Dichloroethylene			
1,2 - trans-Dichloroethylene			
1,2 - Dichloropropane			
Ethylbenzene	0.64	420	
Methylene chloride		52	
Bromoform			
Dichlorobromomethane			
Trichlorofluoromethane			
Chlorodibromomethane			
Tetrachloroethylene	0.5	32.4	
Toluene	0.15	260	
Trichloroethylene		280	
Xylenes (o,m,p)	4.1		

LABORATORY RESULTS

CLIENT: TDWR TX 02496

DATE RECEIVED: 2-21-84

Parameter	Sample I.D.	Water - Off-site	Water - Catchment Basin	Water - Drum Storage
	ES #	1 4725	1 4724	1 4721
	Units	ug/L	ug/L	ug/L

Benzene			28.8 mg/L	97
Carbon tetrachloride				
Chlorobenzene				
1,2 - Dichloroethane	346	820	mg/L	4520
1,1,1 - Trichloroethane		2930		
1,1 - Dichloroethane	15			
1,1,2 - Trichloroethane				
Chloroform				
1,1 - Dichloroethylene	54			
1,2 - trans-Dichloroethylene				
1,2 - Dichloropropane				
Ethylbenzene	22	1310		116
Methylene chloride				
Bromoform				
Dichlorobromomethane				
Trichlorofluoromethane				
Chlorodibromomethane				
Tetrachloroethylene				
Toluene	27	2520		104
Trichloroethylene	42	890		
Xylenes (o,m,p)		5460		436

LABORATORY RESULTS

CLIENT: TDWR TX 02496

DATE RECEIVED: 2-21-84

Parameter	Sample I.D.	Water - Tank Farm		
	ES #	¹ 4720		
	Units			

Benzene	175 ug/L
Carbon tetrachloride	
Chlorobenzene	
1,2 - Dichloroethane	81.8 mg/L
1,1,1 - Trichloroethane	
1,1 - Dichloroethane	
1,1,2 - Trichloroethane	
Chloroform	
1,1 - Dichloroethylene	
1,2 - trans-Dichloroethylene	
1,2 - Dichloropropane	
Ethylbenzene	11.5 mg/L
Methylene chloride	
Bromoform	12.6 mg/L
Dichlorobromomethane	
Trichlorofluoromethane	
Chlorodibromomethane	
Tetrachloroethylene	37.6 mg/L
Toluene	16.6 mg/L
Trichloroethylene	
Xylenes (o,m,p)	47.7 mg/L

LABORATORY RESULTS

CLIENT: TDWR TX 02496

DATE RECEIVED: 2-21-84

Parameter	Sample I.D. ES # Units	Background Soil	Soil - Landfill	
		4718	4719	
		ug/g	ug/g	
Benzene		< 0.05	< 0.05	
Carbon tetrachloride		< 0.5	< 0.5	
Chlorobenzene		< 0.05	< 0.05	
1,2 - Dichloroethane		< 0.1	< 0.1	
1,1,1 - Trichloroethane		< 0.1	< 0.1	
1,1 - Dichloroethane		< 0.1	< 0.1	
1,1,2 - Trichloroethane		< 0.1	< 0.1	
1,1,2,2-Tetrachloroethane		< 0.1	< 0.1	
Chloroform		< 0.5	< 0.5	
1,1 - Dichloroethylene		< 0.1	< 0.1	
1,2 - trans-Dichloroethylene		< 0.1	< 0.1	
1,2 - Dichloropropane		< 0.1	< 0.1	
Ethylbenzene		< 0.05	< 0.05	
Methylene chloride				
Bromoform		< 0.5	< 0.5	
Dichlorobromomethane		< 0.5	< 0.5	
Trichlorofluoromethane		< 0.5	< 0.5	
Chlorodibromomethane		< 0.5	< 0.5	
Tetrachloroethylene		< 0.1	< 0.1	
Toluene		< 0.005	< 0.005	
Trichloroethylene		< 0.1	< 0.1	

CHAIN OF CUSTODY RECORD

PROJ. NO.		PROJECT NAME				NO. OF CONTAINERS	ANALYSIS						REMARKS
36410.03		TDWR-SI (RCRA 3012)					Pb	Zn	Cr	Purgeable organics (Kit PP-1)			
SAMPLERS: (Signature) Robert H Davis Jr. R4 Davis J													
STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION								
TX 02496-1	2/15/84	1200N		X	Background Surface Soil	2	X	X	X	X			
TX 02496-2	2/15/84	1210		X	Surface Soil in landfarm area	2	X	X	X	X			
TX 02496-3	2/15/84	1215		X	Standing water in tank farm	2	X	X	X	X			
TX 02496-4	2/15/84	1225		X	Standing water in drum storage area	2	X	X	X	X			
TX 02496-5	2/15/84	1235		X	Solid waste from top of drum	2	X	X	X	X			
TX 02496-6	2/15/84	1240		X	Sediment from catchment basin	2	X	X	X	X			
TX 02496-7	2/15/84	1240		X	Water from catchment basin	2	X	X	X	X			
TX 02496-8	2/15/84	1255		X	Standing water in ditch offsite	2	X	X	X	X			
TX 02496-9	2/15/84	1300		X	Vegetated sediment in ditch offsite	2	X	X	X	X			
Relinquished by: (Signature) R4 Davis J			Date/Time 2/20/84 1600		Received by: (Signature) Austin Bus Station		Relinquished by: (Signature)			Date/Time		Received by: (Signature)	
Relinquished by: (Signature)			Date/Time		Received by: (Signature)		Relinquished by: (Signature)			Date/Time		Received by: (Signature)	
Relinquished by: (Signature)			Date/Time		Received for Laboratory by: (Signature) [Signature]		Date/Time 2-21 5 PM		Remarks				

4718
4719-4726

ENGINEERING-SCIENCE, INC.

924 GEMINI

HOUSTON, TEXAS 77058

LABORATORY ANALYSIS REQUEST

SUBMITTER: Robert H Davis Jr
Engineering-Science Inc

DATE: 2/20/84
PHONE: (512) 477-9901

REQUESTOR: Same

REQUESTED DATE
OF COMPLETION: 3/8/84

PROJECT #: 36410.03 (TDWR-SI)

SAMPLE TYPE: Industrial Waste (solid), Surface Soil, sediment, standing water
(industrial waste, groundwater, soil, solid waste, etc.)

REQUIRED ANALYSES & DETECTION LIMITS:

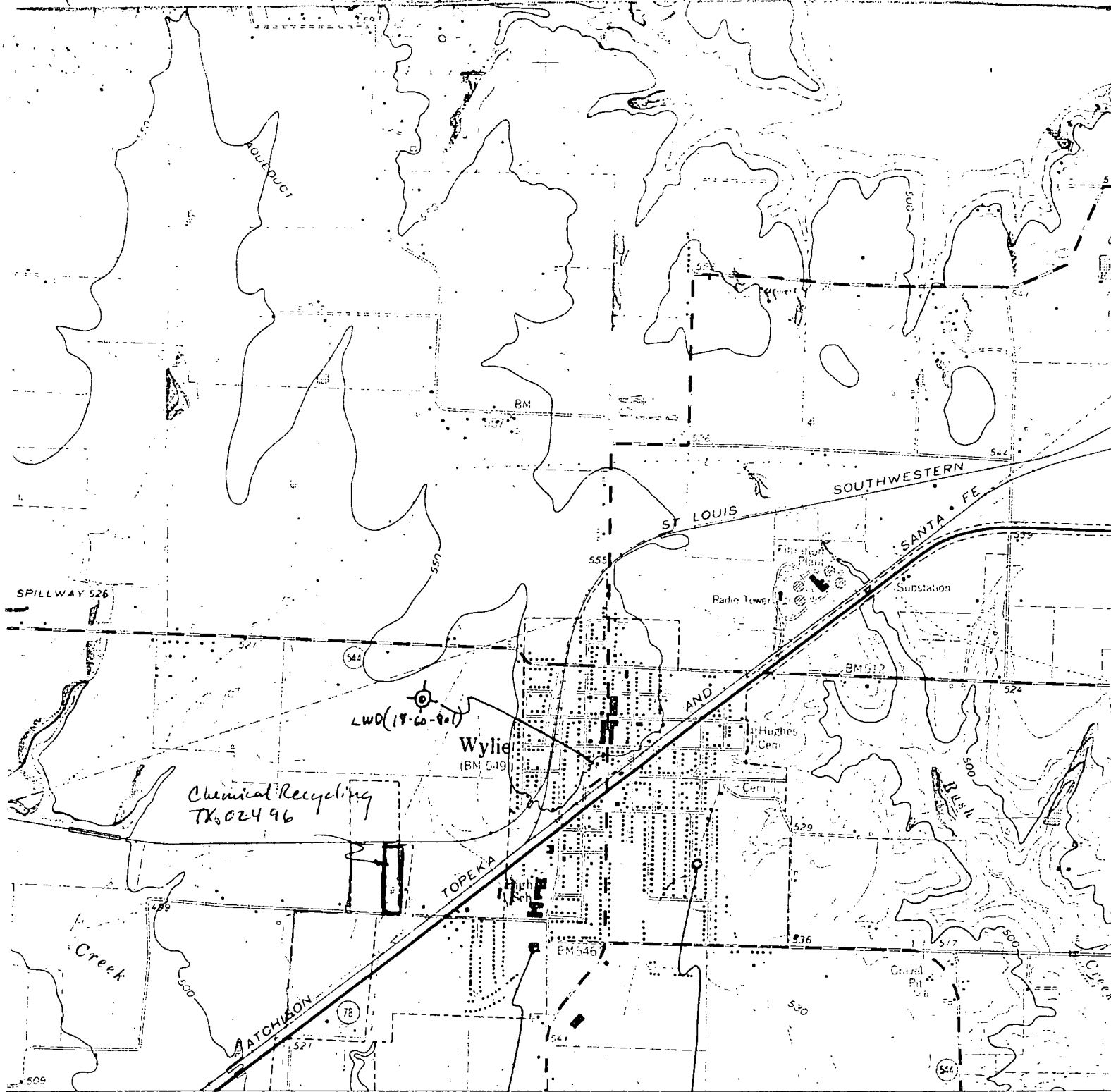
All samples should be analyzed for Pb, Zn, Cr (total digestion)
and for purgeable organics included in PP-1 kit

Two samples were collected at each location to allow for the
two types of analyses requested.

TX 02496

NOTES:

Liquid samples requiring metals analysis were preserved
by HNO₃ addition to pH \leq 2.



(ROWLETT)
6649 1 NE
SCALE 1:24 000
SACHSE 28 MI
GARLAND 84 MI
729 32°30' 730 731
1 MILE
2000 3000 4000 5000 6000 7000 FEET

CONTOUR INTERVAL 10 FEET
GEODETIC VERTICAL DATUM OF 1929

ES WITH NATIONAL MAP ACCURACY STAND
JRVEY, DENVER, COLORADO 80225. OR RE!
OGRAPHIC MAPS AND SYMBOLS IS AVAILABLE

WYLIE, TEX.
N3300-W9630/7.5

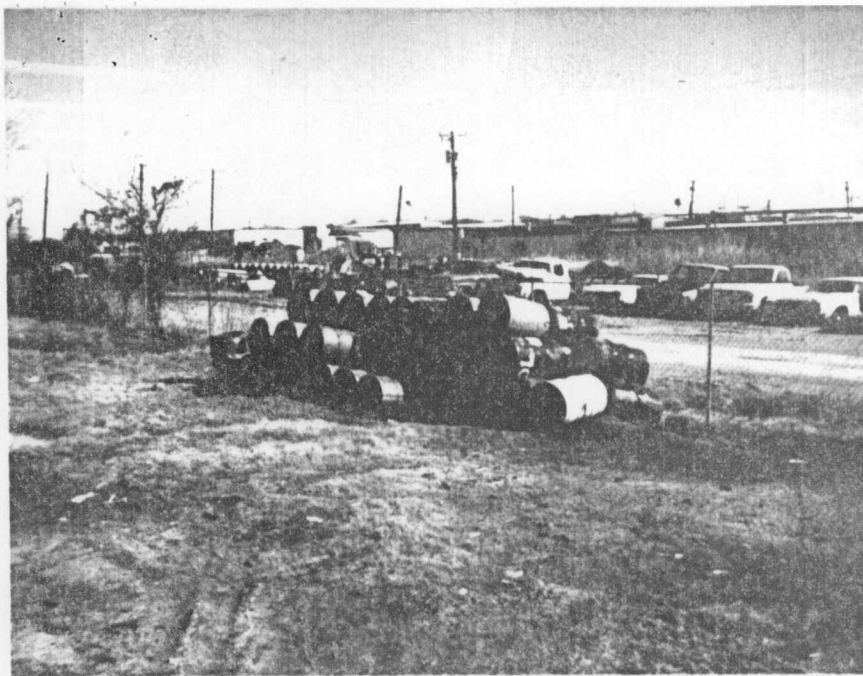
1959
PHOTOREVISED 1968
AMS 6650 11 SE-SERIES V882
PHOTOINSPECTED 1973



QUADRANGLE LOCATION

Heavy-duty
Medium-duty

3396-21



Photographer / Witness

RS Dykes / RH Davis, JR Siemoneit

Date / Time / Direction

2-15-84 / 11:05 / East

Comments: Stack of ~50 empty
drums on east boundary.
Drums are to be reconditioned
off site



Photographer / Witness

RS Dykes / RH Davis, JR Siemoneit

Date / Time / Direction

2-15-84 / 11:05 / West

Comments: Stack of ~400
empty drums adjacent to
whse. Drums to be
reconditioned off-site.



Photographer / Witness

RS Dykes / RH Davis, JR Siemoneit

Date / Time / Direction

2-15-84 / 11:08 / West

Comments: Process area catchment
basin which drains by underground
pipng to sanitary sewer



Photographer / Witness

RS Dykes / RH Davis, JR Siemonit

Date / Time / Direction

2-15-84 / 11:08 / north.

Comments: Catchment basin close up.

Valve is submerged immediately
below overflow stand pipe.

pH of standing water was 11.5



Photographer / Witness

RS Dykes / RHD, JRS.

Date / Time / Direction

2-15-84 / 11:09 / west

Comments: Partially filled in-
coming drums intended for
solvent recovery. Located SE
of process area.



Photographer / Witness

RS Dykes / RHD, JRS.

Date / Time / Direction

2-15-84 / 11:10 / northwest

Comments: Process area on left.

Spill & runoff catchment channel
(unlined)



Photographer / Witness

RS Dykes / RHD Davis JR. Siemonett

Date / Time / Direction

2-15-84 / 11:10 / North

Comments: Still bottom waste
drums awaiting offsite
disposal.



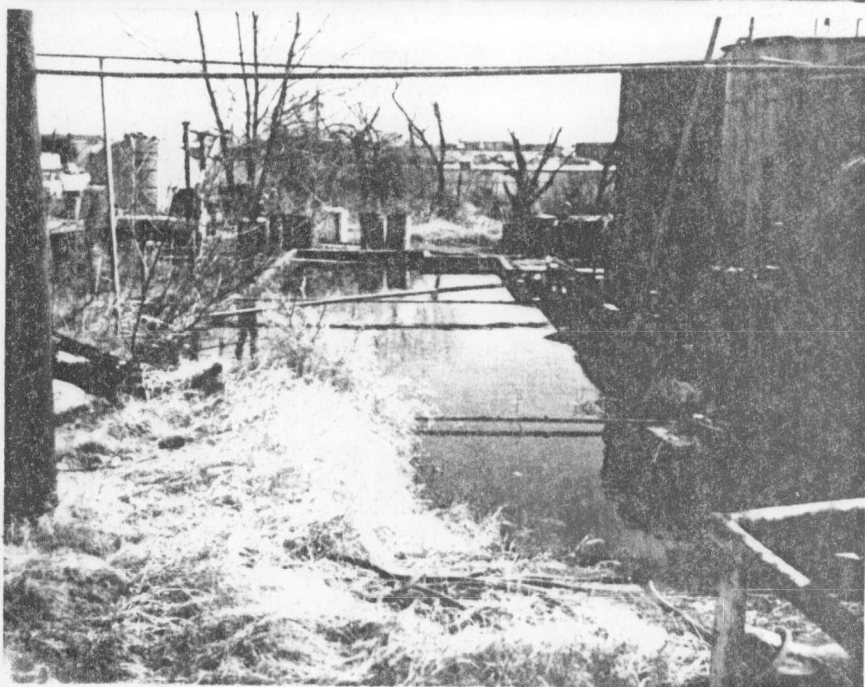
Photographer / Witness

RS Dykes / RHD, JRS

Date / Time / Direction

2-15-84 / 11:15 / North

Comments: Full drums of isopropyl
alcohol awaiting processing.
Immediately west of process
area.



Photographer / Witness

RS Dykes / RHD, JRS

Date / Time / Direction

2-15-84 / 11:18 / East

Comments: Inactive "drying beds"
filled with rainwater.
Immediately north of process
area



Photographer / Witness

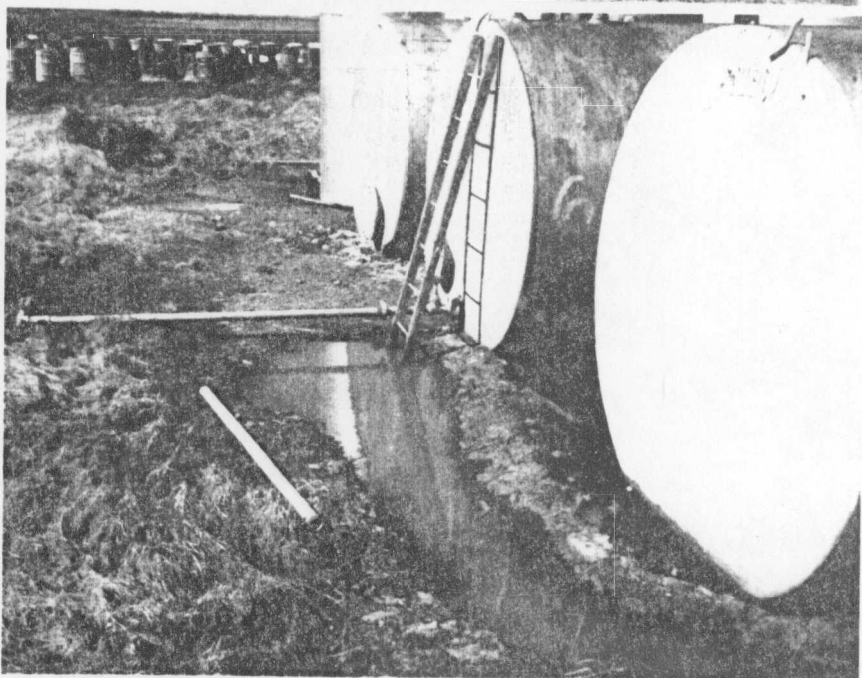
RS Dykes / RH Davis, JRL Siemonist

Date / Time / Direction

2-15-84 / 11:18 / Northeast

Comments: Diked tank farm

area.



Photographer / Witness

RS Dykes / RHD, JRS

Date / Time / Direction

2-15-84 / 11:22 / West

Comments: Standing water in
southeast corner of tank
farm.



Photographer / Witness

RS Dykes / RHD, JRS

Date / Time / Direction

2-15-84 / 11:20 / North

Comments: Designated drum
storage area. Low diking
was observed at perimeter.

At one time, this area held
~1200 drums.



Photographer / Witness

RS Dykes / RH Davis, JRL Siemonit

Date / Time / Direction

2-15-84 / 11:25 / East

Comments: Spilled paint on
surface soil in drum storage
area.



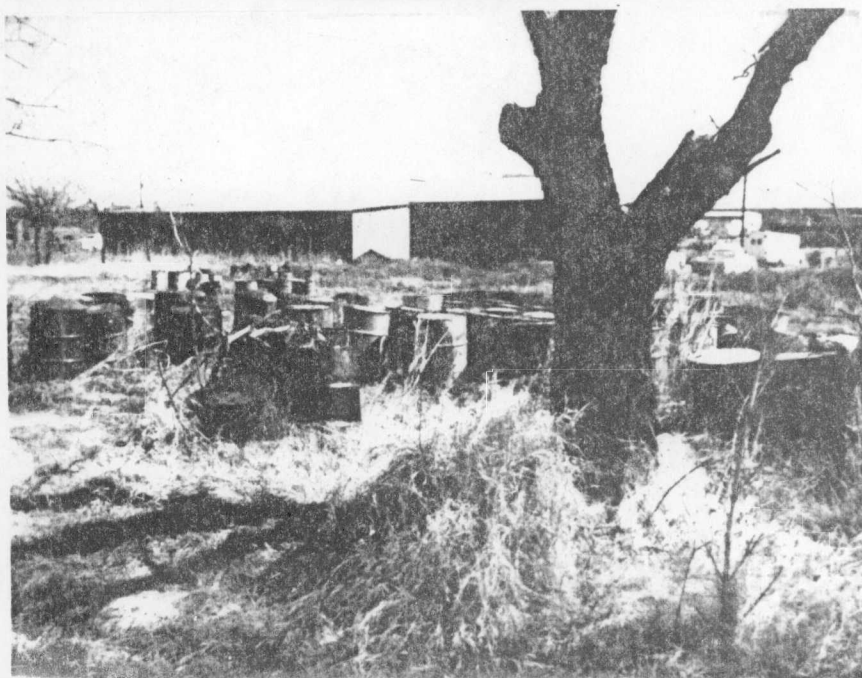
Photographer / Witness

RS Dykes / RHD, JRS

Date / Time / Direction

2-15-84 / 11:25 / Northeast

Comments: Drums in various
conditions in drum storage area.



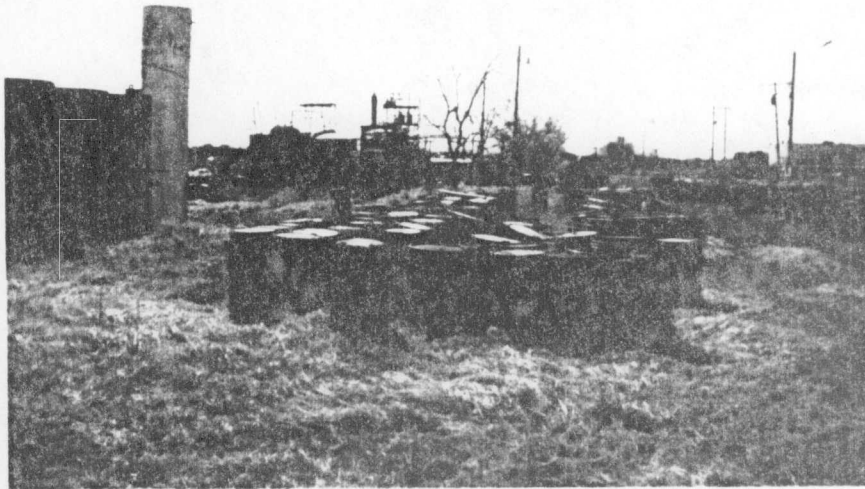
Photographer / Witness

RS Dykes / RHD, JRS

Date / Time / Direction

2-15-84 / 11:28 / East

Comments: Miscellaneous drums
not inside drum storage area



Photographer / Witness

RS Dykes / RH Davis, JR Siemoneit

Date / Time / Direction

2-15-84 / 11:30 / South

Comments: Looking across ~700
drums on west boundary. Drums
contain dried still bottoms
awaiting potential resale.



Photographer / Witness

RS Dykes / RHD, JRS

Date / Time / Direction

2-15-84 / 11:35 / East

Comments: Natural pond on-site
Pond was overtaken by cattails
and bulrushes. Two ducks were
observed in water.

Photographer / Witness

Date / Time / Direction

Comments:



Photographer / Witness

RS Dykes / RH Davis

Date / Time / Direction

2-15-84 / 12:00 / West

Comments: Collection of background
surface soil sample (TX02496-1)



Photographer / Witness

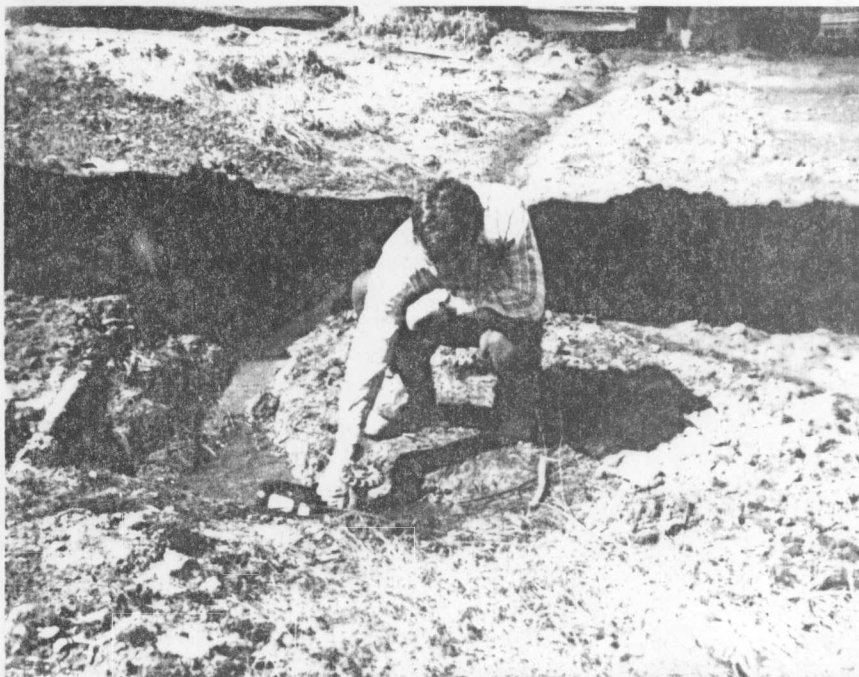
RS Dykes / RH Davis

Date / Time / Direction

2-15-84 / 12:10 / West

Comments: Collection of surface
soil sample in landfarm area
on west boundary road.

(TX02496-2)



Photographer / Witness

RS Dykes / RH Davis

Date / Time / Direction

2-15-84 / 12:15 / West

Comments: Collection of surface
water sample in tank farm near
drain pipe inlet. (TX02496-3)



Photographer / Witness

RS Dykes / RH Davis

Date / Time / Direction

2-15-84 / 12:25 / West

Comments: Collection of standing
water sample from SE corner of
designated drum storage area.

(TX 02496-4)



Photographer / Witness

RS Dykes / RH Davis, JRS

Date / Time / Direction

2-15-84 / 12:35 / North

Comments: Collection of Waste sample
Dried still bottom waste from top
of drum (TX 02496-5)



Photographer / Witness

RS Dykes / RH Davis

Date / Time / Direction

2-15-84 / 12:40 / South

Comments: Collection of Sediment
Sample in Catchment basin immediate
South of process area.

(TX 02496-6)



Photographer / Witness

RS Dykes / RH Davis

Date / Time / Direction

2-15-84 / 12:40 / Down

Comments: Collection of water
sample in catchment basin
(TX - 02496-7)



Photographer / Witness

RS Dykes / RH Davis

Date / Time / Direction

2-15-84 / 12:55 / East

Comments: Collection of runoff
water sample in ditch
along SE corner of site
(TX 02496-8)



Photographer / Witness

RS Dykes / RH Davis

Date / Time / Direction

2-15-84 / 13:00 / NW

Comments: Collection of sediment
sample in runoff path along
SE corner of site
(TX 02496-9)